

UNITED STATES OF AMERICA,

Plaintiff,

JAMES DOGHRAMJI; SHEREE COOK;
and RACHEL BRYANT

V.

Defendants.

JURY DEMAND

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amount of \$61,840.54. These fees are based on reasonable hourly rates charged by counsel and their staff in this litigation. These fees, costs, and expenses have been kept contemporaneously by Relators' counsel in their firms' billing systems during the course of this litigation.

As discussed in the accompanying Memorandum of Law, Relators are entitled to recover their reasonable fees, costs, and expenses incurred in this litigation for their work performed in furtherance of this litigation and settlement. A substantial amount of this work was done in conjunction with counsel for the United States as the case was investigated, litigated, and, ultimately, resolved in an amount representing the largest FCA settlement in the Middle District of Tennessee.

In addition to their Memorandum of Law, Relators offer declarations from qualified attorneys as to the reasonableness of Relators' counsels' fees, costs, and expenses, as well as the importance of their work performed in conjunction with the government's counsel. These declarations include: a declaration from Arthur R. Miller, one of the nation's preeminent scholars in the areas of complex litigation, class actions, copyright, and civil procedure, who taught for more than thirty years at Harvard Law School and who currently teaches at the New York University School of Law; a declaration from Frank W. Hunger, a former U.S. Assistant Attorney General who supervised the enforcement of the False Claims Act for the U.S. Department of Justice from 1993 to 1999, who is now in private practice in Nashville, Tennessee; and a declaration from Sam S. Sheldon, who served in the U.S. Department of Justice as the Deputy Chief of the Criminal Fraud Division and as head of the Health Care Fraud Unit from 2011 through 2013, who is now in private practice in Washington, D.C.

Relators also submit declarations from the following attorneys, each of whom testifies as to the reasonableness of the hourly rates of Relators' counsel: Michael L. Russell of the

Tennessee bar; W. Michael Hamilton of the Tennessee bar; Leon Dayan of Washington, D.C.; Charles R. Both of Washington, D.C.; and Mark A. Griffin of Seattle, Washington. Each of these attorneys offers declarations setting forth their background and experience, as well as their opinions as to the reasonableness of attorneys' fees charged by Relators' counsel in this matter.

For the reasons addressed in the accompanying Memorandum and supporting Declarations, this Court should grant Relators' Motion and award Relators their attorneys' fees, costs, and expenses in accordance with 31 U.S.C. § 3730(d).

Date: September 29, 2014

Respectfully submitted,

/s/ David W. Garrison

David W. Garrison

Scott P. Tift

**BARRETT JOHNSTON MARTIN
& GARRISON, LLC**

Bank of America Plaza

414 Union Street, Suite 900

Nashville, TN 37219

Tel: (615) 244-2202

Fax: (615) 252-3798

dgarrison@barrettjohnston.com

stift@barrettjohnston.com

Reuben A. Guttman

Traci L. Buschner

GRANT & EISENHOFER P.A.

1747 Pennsylvania Ave., NW, Suite 875

Washington, DC 20006

Tel: (202) 386-9500

Fax: (202) 386-9505

rguttman@gelaw.com

tbuschner@gelaw.com

Kit A. Pierson

David A. Young

**COHEN MILSTEIN SELLERS
& TOLL PLLC**

1100 New York Ave NW

Suite 500 West

Washington, DC 20005

Tel: (202) 408-4600
Fax: (202) 4084699
kpierson@cohenmilstein.com
dyoung@cohenmilstein.com

Attorneys for Relators

CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2014, a copy of the foregoing *Relators' Motion for Award of Attorneys' Fees, Costs, and Expenses* was filed electronically with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to the counsel of record listed below.

John R. Jacobson
William M. Outhier
Riley Warnock & Jacobson, PLC
1906 West End Avenue
Nashville, TN 37203

John-David H. Thomas
Assistant United States Attorney
Office of the United States Attorney
Middle District of Tennessee
110 Ninth Avenue, S
Suite A961
Nashville, TN 37203

/s/ David W. Garrison

DAVID W. GARRISON
BARRETT JOHNSTON